



BEFORE THE PUBLIC UTILITIES COMMISSION OF THE STATE OF CALIFORNIA

Application of Pacific Gas And Electric
Company (U 39-E) for Approval of
2008-2020 Air Conditioning Direct
Load Control Program

A.07-04-009

**MOTION OF THE DIVISION OF RATEPAYER ADVOCATES FOR
PROPOSED DESIGNATION OF EXHIBITS AND REQUEST
FOR OFFICIAL NOTICE**

I. MOTION FOR PROPOSED DESIGNATION OF EXHIBITS

Pursuant to Rule 13.8 of the Commission's Rules of Practice and Procedure, the Division of Ratepayer Advocates (DRA) respectfully files this Motion for Proposed Designation of Exhibits.

DRA hereby moves the Commission to receive the following documents into evidence in this proceeding:

1. The public and confidential versions of "Prepared Testimony of Sudheer Gokhale, Pacific Gas & Electric Company's Application for Approval of 2008-2020 Air Conditioning Direct Load Program," and related appendices, identified as Exhibit DRA-1 and Exhibit DRA-1c, respectively. The confidential information identified in Exhibit DRA-1c and related appendices reference proprietary data designated by PG&E in the application and supporting documents filed in this docket. DRA moves to seal Exhibit DRA-1c pursuant to PG&E's request for confidential treatment and motion to seal. DRA at this time does not take a position regarding the treatment of the utilities' request for confidentiality.

2. The responses to all DRA data requests propounded on PG&E, as noted below.

<u>Data Response</u>	<u>Description</u>	<u>Proposed Exhibit #</u>
DRA-001-01	PG&E Workpapers	DRA-2
DRA-001-01Supp01	Supplement to PG&E Workpapers	DRA-3
DRA_002-01-15	DRA Data Request #2, questions 1-15	DRA-4
DRA_003-01-05	DRA Data Request #3, questions 1-5	DRA-5
DRA_004	DRA Data Request #4	DRA-6
DRA_005-01-16	DRA Data Request #5, questions 1-16	DRA-7
DRA_005-09 Supp01	DRA Data Request #5, supplement to question 9	DRA-8

DRA notes that several of the responses submitted by PG&E also are designated as confidential, and will need proprietary treatment pursuant to PG&E's request.

3. PG&E's responses to all data requests propounded by Energy Division.

The exhibits described above are too voluminous to serve as an attachment to this motion. Therefore, pursuant to a telephone discussion with ALJ Bemserderfer on October 22, 2007, any exhibit referenced to in briefs by DRA will be attached as an appendix to the brief.

II. REQUEST FOR OFFICIAL NOTICE

Pursuant to Rule 13.9 of the Rules of Practice and Procedure, DRA also requests that the Commission take official notice of the following:

1. *Response of the California Independent System Operator to CLECA Motion to Strike Portions of the Revised IOU's Straw Proposal for Demand Response Cost Effectiveness*, dated October 4, 2007, in Rulemaking (R.) 07-01-041.
2. California Independent System Operator Corporation's Second Status Report, dated September 17, 2007, in the Federal Energy Regulatory Commission's Docket No. ER06-615-012.

3. *Post-Workshop Reply Comments of The California Independent System Operator Corporation on Resource Adequacy Phase 2, Track 1 Proposals*, dated April 20, 2007, in Rulemaking (R.) 05-12-013.

In considering PG&E's instant application, the Commission must be consistent with its objectives in these separate but related proceedings. DRA believes the comments will provide useful information regarding the integration of interruptible/emergency demand response programs into CAISO's operational needs in the Market Redesign and Technology Upgrade (MRTU). Therefore, the Commission should incorporate the discussion from these dockets to address these overlapping issues.

Respectfully submitted,

/s/ LISA-MARIE SALVACION

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October 22, 2007

CERTIFICATE OF SERVICE

I hereby certify that I have this day served a copy of “**MOTION OF THE DIVISION OF RATEPAYER ADVOCATES FOR PROPOSED DESIGNATION OF EXHIBITS AND REQUEST FOR OFFICIAL NOTICE**” in **A.07-04-009** by using the following service:

☒ **E-Mail Service:** sending the entire document as an attachment to all known parties of record who provided electronic mail addresses.

☐ **U.S. Mail Service:** mailing by first-class mail with postage prepaid to all known parties of record who did not provide electronic mail addresses.

Executed on October 22, 2007 at San Francisco, California.

/s/ HALINA MARCINKOWSKI

Halina Marcinkowski

N O T I C E

Parties should notify the Process Office, Public Utilities Commission, 505 Van Ness Avenue, Room 2000, San Francisco, CA 94102, of any change of address and/or e-mail address to insure that they continue to receive documents. You must indicate the proceeding number on the service list on which your name appears.

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